

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SARAH J. PIERCE,

Case No: 22-CV-04748 (AT)

Plaintiff,

-against-

BETTER HOLDCO, INC., VISHAL GARG,  
and NICHOLAS CALAMARI,

**NOTICE OF  
CROSS-MOTION FOR  
LEAVE TO FILE AN  
AMENDED COMPLAINT  
UNDER FRCP 15**

Defendants.

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law (which also is submitted in opposition to Defendants' respective motions to dismiss), the Declaration of Neal Brickman, including the exhibits attached thereto, and all prior pleadings and submissions in this matter, Plaintiff Sarah J. Pierce ("Pierce"), by and through her undersigned counsel, hereby moves this Court before the Honorable Analisa Torres, United States District Judge for the Southern District of New York, at the Daniel P. Moynihan United States Courthouse located at 500 Pearl Street, New York, New York 10007, Courtroom 15D, on a date and time to be set by the Court, for leave to file an Amended Complaint (a copy of which is attached to the Brickman Declaration) pursuant to FRCP Rule 15.

Dated: New York, New York  
November 1, 2022

*Neal Brickman*

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